

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

HELIX MICROINNOVATIONS LLC,)	
)	
Plaintiff,)	
v.)	Civil Action No. 6:24-cv-402-ADA
)	
ON SEMICONDUCTOR CORPORATION,)	
)	
Defendant.)	
)	

JOINT MOTION TO TRANSFER TO THE DISTRICT OF DELAWARE

Plaintiff Helix Microinnovations LLC and Defendant ON Semiconductor Corporation jointly move pursuant to 28 U.S.C. § 1404(a) that the Court transfer this case to the District of Delaware. Because Defendant ON Semiconductor Corporation does not have a regular and established place of business in this judicial district or a manufacturing facility in this judicial district, venue is not proper as to ON Semiconductor Corporation in this judicial district. Because ON Semiconductor Corporation is a Delaware corporation, this action might have been brought in the District of Delaware. All parties to this action consent to this transfer.

A proposed order is attached.

Dated: October 3, 2024

Respectfully submitted,

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Attorneys for ON Semiconductor Corporation

CERTIFICATE OF CONFERENCE

In compliance with Local Rule CV-7G, counsel for Plaintiff and counsel for Defendant conferred regarding the motion to transfer venue on October 3, 2024. Counsel for Defendant joins in this motion and the relief sought hereby.

/s/ Isaac Rabicoff

Isaac Rabicoff

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 3rd day of October 2024, with a copy of this document via the Court's CM/ECF system

/s/ Isaac Rabicoff
Isaac Rabicoff